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FOOD STANDARDS AGENCY CONSULTATION

DRAFT GUIDANCE ON LEGAL COMPLIANCE AND BEST PRACTICE FOR BUSINESS DOCUMENTATION - MATERIALS AND ARTICLES IN CONTACT WITH FOOD

CONSULTATION SUMMARY PAGE

Date consultation launched:	Closing date for responses:
12th January 2009	10th April 2009

Who will this consultation be of most interest to?

1. The guidance is aimed at businesses that use materials and articles intended to come into contact with food, or those that could be brought into contact with food or those that could be the source of chemical migration into food. These businesses will range from large to small in size and scale of operation and will include material and article manufacturers, material recyclers, material converters, fillers, importers and sellers on the market prior to the retail stage. It is also relevant to port and environmental health and trading standards officers involved in the enforcement of the law governing these materials and articles. The guidance is specifically for those businesses and enforcement officers that operate in England, but it is also relevant to those that operate in Northern Ireland, Scotland and Wales where parallel legislation is in place.

What is the subject of this consultation?

2. This guidance addresses the legal requirements of Regulation (EC) No. 1935/2004 on materials and articles in contact with food in relation to business documentation as it is required in conjunction with Regulation (EC) No. 2023/2006 on good manufacturing practice; plus particular requirements in specific EU measures enacted in legislation in England dealing with declarations of compliance as they apply to the materials that are the subject of those measures; and best practice in this area.

If you would prefer to receive future FSA consultations by e-mail, or if you no longer wish to receive information on this subject please notify the named person in this consultation.

What is the purpose of this consultation?

3. To ensure that the draft generic guidance successfully deals with the issues it addresses, is helpful to businesses in meeting their legal obligations and to enforcement officers in their work as authorised officers of food authorities. Comment is sought on the accuracy and completeness of the guidance. Whilst generic in its coverage, it cannot deal with all issues that affect all business sectors; it nonetheless has to cover the legal requirements laid down in the law. The best practice it proposes should not leave issues out that affect all businesses and enforcement officers.

Responses to this consultation should be sent to:

Mrs A. N. Shah

Food Protection Division

FOOD STANDARDS AGENCY

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London
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Is an Impact Assessment included with this consultation?	**Yes** ☐	**No** ☒ **See Annex A for reason.**

DRAFT GUIDANCE ON LEGAL COMPLIANCE AND BEST PRACTICE FOR BUSINESS DOCUMENTATION - MATERIALS AND ARTICLES IN CONTACT WITH FOOD

DETAIL OF CONSULTATION

Introduction

1. We would welcome your comments on the proposed draft guidance which is based around the legal requirement for ensuring that only safe food contact materials and articles are placed on the market in the United Kingdom and, in a wider context, the European Union. The area of the law with which this guidance concerns itself lays down requirements that ensure that any migration of chemicals from food contact materials and articles into food is at levels that will not harm human health nor detrimentally affect the nature or quality of the food. It focuses on the requirements to document good manufacturing practice procedures and to both document and attest the legal compliance of goods down the manufacturing chain. This is a principle means of control for both the business operator, who will want to ensure that products are compliant and consistently produced, and for the enforcement authorities.

Proposals

2.

Key proposal(s):

- **for business documentation based on legal requirements laid down in:**
- **Regulation (EC) No. 2023/2006 on good manufacturing practice; and**
- **Regulation (EC) No. 1935/2004 on materials and articles in contact with food;**
- **the further elaboration required by Directive 2002/72/EC on plastic materials and articles in contact with food;**
- **Directive 2005/31/EC amending Council Directive 84/500/EEC as regards a declaration of compliance and performance criteria of the analytical method for ceramic articles intended to come into contact with foodstuffs; and,**
- **Directive 2007/42/EC relating to materials and articles made of regenerated cellulose film intended to come into contact with foodstuffs.**
- **Directive 2002/72/EC is enacted in England by The Plastic Materials and Articles in Contact with Food (England) Regulations 2008, the other Directives are enacted in England by The Materials and Articles in Contact with Food (England) Regulations 2007.**

Consultation Process

3. Nominations were accepted for delegates to attend a workshop that was advertised on the Agency's website and held in November 2008. That workshop invited delegates to look at the draft guidance and best practice and comment freely in open discussion on its content and make suggestions for improvement with a view to making the draft a more accurate, useful and useable guide. Various suggestions

were made to improve the content. The document on which you are now invited to comment is the version amended by those comments.

4. In parallel with this public consultation, the Agency is funding trials involving particular volunteer enforcement authorities and local businesses to test the guidance and best practice in actual use.

Questions asked in this consultation:

Q1: Is the guidance accurate in reflecting the requirements laid down in the law?
Q2: Is the guidance drafted in a way that helps you understand your obligations? If not how do you suggest it might be improved?
Q3: Does the guidance help you meet those requirements?
Q4: Are there any omissions or shortcomings in the guidance?
Q5: Is the best practice advocated in the guidance helpful?
Q6: Do you have any issues that it does not address?
Q7: What suggestions would you make to improve it?

5. We particularly welcome direct comments from the businesses mentioned that are affected by the legislation we have listed and from members of the Port and Environmental Health Authorities and Trading Standards Departments. In responding to this consultation please make it clear which part of the text of the draft you are referring to and say whether you are commenting on the guidance to the law or the suggestions for best practice. In making your comments please also try to suggest how any inadequacies, deficiencies or improvements could be made and phrased.

6. **Other relevant documents**

- **Regulation (EC) No. 2023/2006 on good manufacturing practice; and**
- **Regulation (EC) No. 1935/2004 on materials and articles in contact with food;**
- **the further elaboration required by Directive 2002/72/EC on plastic materials and articles in contact with food;**
- **Directive 2005/31/EC amending Council Directive 84/500/EEC as regards a declaration of compliance and performance criteria of the analytical method for ceramic articles intended to come into contact with foodstuffs; and,**
- **Directive 2007/42/EC relating to materials and articles made of regenerated cellulose film intended to come into contact with foodstuffs.**

Responses

7. **Responses are required by close 10th April 2009**. Please state, in your response, whether you are responding as a private individual or on behalf of an organisation/company (including details of any stakeholders your organisation represents).

Thank you on behalf of the Food Standards Agency for participating in this public consultation.

Yours faithfully,

Richard Sinclair
(Team Leader, Food Contact Materials Policy and Chemical Contaminants Legislation)
Incident Prevention and Chemical Risk Management 'A'
Food Protection Division

Enclosed

Annex A: Standard Consultation Information

Annex B: Draft Guidance for comment

Annex C: List of interested parties

Queries

1. If you have any queries relating to this consultation please contact the person named on page 1, who will be able to respond to your questions.

Publication of personal data and confidentiality of responses

2. In accordance with the FSA principle of openness our Information Centre at Aviation House will hold a copy of the completed consultation. Responses will be open to public access upon request. The FSA will also publish a summary of responses, which may include personal data, such as your full name and contact address details. If you do not want this information to be released, please complete and return the Publication of Personal Data form, which is on the website at **http://www.food.gov.uk/multimedia/pdfs/dataprotection.pdf** Return of this form does not mean that we will treat your response to the consultation as confidential, just your personal data.

3. In accordance with the provisions of Freedom of Information Act 2000/Environmental Information Regulations 2004, all information contained in your response may be subject to publication or disclosure. If you consider that some of the information provided in your response should not be disclosed, you should indicate the information concerned, request that it is not disclosed and explain what harm you consider would result from disclosure. The final decision on whether the information should be withheld rests with the FSA. However, we will take into account your views when making this decision.

4. Any automatic confidentiality disclaimer generated by your IT system will not be considered as such a request unless you specifically include a request, with an explanation, in the main text of your response.

Further information

5. A list of interested parties to whom this letter is being sent appears in Annex B. Please feel free to pass this document to any other interested parties, or send us their full contact details and we will arrange for a copy to be sent to them direct.

6. Please let us know if you need paper copies of the consultation documents or of anything specified under '**Other relevant documents**'.

7. This consultation has been prepared in accordance with HM Government Code of Practice on Consultation, available at: **http://www.berr.gov.uk/files/file47158.pdf** The Consultation Criteria are available at **http://www.berr.gov.uk/whatwedo/bre/consultation-guidance/page44458.html**

8. Criterion 2 of HM Government Code of Practice on Consultation states *Consultations should normally last for at least 12 weeks with consideration given to longer timescales where feasible and sensible*.

8. The Code of Practice states that an Impact Assessment should normally be published alongside a formal consultation. We have not provided an Impact Assessment with this guidance, that was done in full when the legislative proposals were made that are the subject of this guidance. If you have any evidence that this guidance adds new burdens to those established at that time please provide it with your comments. You can access those impact assessments through the Agency's website at:

http://www.food.gov.uk/consultations/consulteng/2007/contact08eng

http://www.food.gov.uk/consultations/consulteng/2007/foodcontactengland07

http://www.food.gov.uk/consultations/consulteng/2005/foodcontacteng2005

9. For details about the consultation process (not about the content of this consultation) please contact: Food Standards Agency Consultation Co-ordinator, Room 2C, Aviation House, 125 Kingsway, London, WC2B 6NH. Tel: 0207 276 8630.

Comments on the consultation process itself

10. We are interested in what you thought of this consultation and would therefore welcome your general feedback on both the consultation package and overall consultation process. If you would like to help us improve the quality of future consultations, please feel free to share your thoughts with us by using the Consultation Feedback Questionnaire at
11. http://www.food.gov.uk/multimedia/worddocs/consultfeedback.doc

12. If you would like to be included on future Food Standards Agency consultations on other topics, please advise us of those subject areas that you might be specifically interested in by using the Consultation Feedback Questionnaire at http://www.food.gov.uk/multimedia/worddocs/consultfeedback.doc**.** The questionnaire can also be used to update us about your existing contact details.

Guidance on Legal Compliance and Best Practice for Business Documentation

MATERIALS AND ARTICLES IN CONTACT WITH FOOD

December 2008

If you require this information in an alternative format – such as audio, large print, Braille – please contact us.

CONTACT TELEPHONE 0207 276 8553 or 8594

Summary

Intended audience:	This guidance is relevant to businesses that, in the course of their business, use materials and articles intended to come into contact with food, or those that could be brought into contact with food or those that could be the source of chemical migration into food. These businesses will range from large to small in size and scale of operation and will include material and article manufacturers, material recyclers, converters, fillers, importers and sellers on the market. It is also relevant to environmental health and trading standards officers involved in the enforcement of the law governing these materials and articles.
Regional coverage:	This guidance is specifically for those businesses and enforcement officers that operate in England, but it is also relevant to those that operate in Northern Ireland, Scotland and Wales where parallel legislation is in place.
Legal status:	This guidance is intended to: • be used in conjunction with the regulations it names; and, • address issues of best practice as highlighted in the following pages.
Purpose:	This guidance addresses • the legal requirements of Regulation (EC) No. 1935/2004 on materials and articles in contact with food in relation to business documentation as it is required in conjunction with Regulation (EC) No. 2023/2006 on good manufacturing practice; plus particular requirements in specific EU measures enacted in legislation in England dealing with declarations of compliance as they apply to the materials that are the subject of those measures; and • best practice in this area.

REVISION HISTORY

Revision No.	Revision date	Purpose of revision	Revised by
1	December 2008	Draft Guidance	Richard Sinclair (FSA)

CONTENTS

LEGAL STATUS

1. These guidance notes should be read in conjunction with the legislation itself. A table of relevant sections of the legislation is provided at Annex 3 The guidance on legal requirements should not be taken as an authoritative statement or interpretation of the law, as only the courts have this power. It is ultimately the responsibility of individual businesses to ensure their compliance with the law. Compliance with the advice on best practice is **not** required by law. **To distinguish between the two types of information, all advice on best practice is in shaded boxes, with a heading of Best Practice.**

2. Businesses with specific queries may wish to seek the advice of their local enforcement agency, which will usually be the trading standards/environmental health department of the local authority.

INTRODUCTION

3. This guidance is based around the legal requirement for ensuring that only safe food contact materials and articles are placed on the market in the United Kingdom and, in a wider context, the European Union. The area of the law with which this guidance concerns itself lays down requirements that ensure that any migration of chemicals from food contact materials and articles into food is at levels that will not harm human health nor detrimentally affect the nature or quality of the food. It focuses on the requirements to document good manufacturing practice procedures and the legal compliance of goods down the manufacturing chain. This is a principle means of control for both the business operator and for the enforcement authorities.

4. Foods come into contact with many different materials during preparation, processing, packing and transportation. These materials will be used in the machinery used to prepare and process the food, package the food and to serve the food to the final consumer. Much of the equipment used in food preparation and processing will consist of many materials, while modern packaging will often consist of multiple layers of different materials.

5. Within the European Union there is detailed legislation that controls the migration of chemicals into food from food contact materials and articles and

that legislation is fully implemented in the United Kingdom. The legislation develops continuously as scientific understanding and laboratory techniques improve and develop. These controls exist to ensure that the final consumer is protected from any damaging effects to their health arising from ingesting food contaminated with harmful levels of chemicals from these materials and articles. These health effects would not be immediately apparent, as would be the case with food poisoning arising from bacterial contamination of the food. The effects are cumulative over a lifetime and affect aspects of, for example, the development of cancers and reproductive health. The controls also exist to ensure that the consumer can buy food that has not been adversely affected by such migration, even if the levels of migration are insufficient to harm health. Finally, the controls ensure that businesses compete for trade throughout the EU under a single set of harmonised rules rather than a plethora of different rules in each one of the EU Member States. It is essential that the rules governing these food contact materials and articles are understood by those who use them in the course of their business and those charged with their enforcement.

6. **It is the sole responsibility of business operators to make sure that the goods in which they trade comply with the law that applies to them.** It is therefore incumbent upon business operators to make sure they are aware of the requirements of the law and ensure their goods comply with it. It is essential that business operators at each stage of the production and commercial use of food contact materials, whether virgin or recycled, and the articles made from them establish their own in-house controls to ensure the compliance of the goods they produce and/or trade in and that they attest that compliance to their customers in relation to the specific rules that apply to the product. As well as ensuring the freedom to trade in safe, legally compliant products, in-house controls and documentation will help ensure that the adventitious migration of chemicals into food is minimised through good manufacturing practice at each stage of production – and this is part of the legal requirement placed upon business operators. **The law applies equally to material and article manufacturers, converters, fillers, sellers and importers.**

FOOD CONTACT MATERIALS

7. Food contact materials and articles comprise a broad and complex range of goods. Among the most widely used materials are the many types of plastic used for bottles, utensils, films and containers. There is also a wide range of paper and board products, laminates and metal and wooden containers. Many modern forms of packaging will make use of all these in a single packaging product and will also contain adhesives to bond layers together and coatings and lacquers that allow the packaging to protect the foodstuff under often very harsh conditions during processing and transportation. Many materials can be wholly or partially sourced from recycled material from production scrap to post-consumer waste.

8. As well as materials used for packaging the food, others will be used in the equipment that prepares or processes the food. This equipment will bring the food into contact with many different types of surface made from, for example, metal, plastic, wood and rubber. There are also the food surfaces and preparation equipment used in the home and in the garden, barbecues and articles such as crockery and cutlery on which and with which food is served.

9. In addition to these materials and articles, printing inks will have been used on the packaging to attract us to buy it, to inform us of the foodstuffs' ingredients and of its nutritional value to us. There may also be instructions to tell us how to treat the food safely before we consume it. All materials and articles in contact with food directly or indirectly will be made from and probably treated with chemicals to help them perform their role safely and reliably.

LEGISLATION

10. Throughout the EU the core legislation controlling all food contact materials and articles is European Regulation (EC) number 1935/2004. This Regulation came into force on 3 December 2004 and replaced the previous 'framework' Directive that had been in place for fifteen years, Council Directive 89/109/EEC. The European Regulation is directly and fully applicable in all EU Member States. National regulations in each of the countries of the United Kingdom, such as The Materials and Articles in

Contact with Food (England) Regulations 2005, were put in place to establish the means for enforcing the EU Regulation. They also create offences for failing to comply with that Regulation and defences against some alleged offences, along with the penalties that may be imposed by the Courts upon conviction for an offence.

11. The Regulation applies to all materials and articles which, in their finished state, are intended to come into contact with food, including so-called 'active' and 'intelligent' food contact materials and articles. It also brings two other types of materials or articles within the scope of the Regulation. The first are those materials and articles that can reasonably be expected to be brought into contact with foods, for example the linings inside refrigerators. The second are those that can reasonably be expected to transfer their constituents to food, for example, printing inks and adhesive labels that may be used on packaging. However, it specifically excludes covering or coating substances that are part of the food and that may be eaten with it, such as sausage skin and edible cheese rinds. Also excluded are materials and articles supplied as antiques that may have been manufactured and placed on the market before 1st January 1980, when the first EU-harmonised rules on food contact materials and articles came into effect. Materials and articles that are used in fixed public and consumer water supply systems are also excluded from this Regulation.

12. The Regulation requires that all food contact materials and articles should be manufactured using good manufacturing practice (see paragraph 4.2 and 5 below). In normal use, they may not transfer their constituents to food in quantities that could endanger human health or cause unacceptable changes in the composition of food or a deterioration to its taste, texture, aroma and appearance. Whilst this encompasses the traditional provision dealing with the adventitious migration of substances for food contact materials and articles, this Regulation also makes a failsafe provision for instances of intended migration that arise in the case of active food contact materials and articles. It also requires that the labelling, advertising and presentation of a material or article shall not mislead the consumer.

BUSINESS DOCUMENTATION

13. The legal requirement for business documentation is based on two sets of needs and they are both rooted in legal requirements laid down in EU legislation. These are: Regulation (EC) No. 2023/2006 on good manufacturing practice and Regulation (EC) No. 1935/2004 on materials and articles in contact with food. This latter Regulation is given further elaboration in Directives: 2002/72/EC on plastic materials and articles in contact with food; 2005/31/EC amending Council Directive 84/500/EEC as regards a declaration of compliance and performance criteria of the analytical method for ceramic articles intended to come into contact with foodstuffs; and, 2007/42/EC relating to materials and articles made of regenerated cellulose film intended to come into contact with foodstuffs. Directive 2002/72/EC is enacted in England by The Plastic Materials and Articles in Contact with Food (England) Regulations 2008, the other Directives are enacted in England by The Materials and Articles in Contact with Food (England) Regulations 2007. The devolved administrations in Northern Ireland, Scotland and Wales have parallel legislation in force. The first of these needs is for the business to ensure the standards of its own processes and procedures to ensure the documentation, application and review of good manufacturing practice. The second is the need for the business to provide adequate documentation to help its downstream customers meet their legal obligations through the provision of comprehensive compliance declarations that address all the legal requirements that pertain to their product(s). Both these requirements are part of a total approach to safe, consistently manufactured, formed and used products. Each part complements the other.

14. Satisfying the first need will require the business to examine its processes and procedures to ensure that it establishes the means for achieving and maintaining acceptable standards of quality and quality control for its products and its customers. To establish and document the processes requires a step by step, systematic approach to identify the minimum acceptable standards for each stage of the business operation. In **manufacturing** this will involve examination and documentation of the process from establishing the standards for raw materials, the time and temperature and other technical requirements of the processes, the means of assuring the quality of the finished product and the means for reviewing, identifying and correcting variations from the standards. In **importing**

businesses it will involve examination and documentation of the controls necessary to establish the provenance and quality of the import, including knowledge of the supplier's ability to meet the standards necessary to produce goods that will comply with the EU laws applicable to them.

15. Satisfying the second need will require the business to establish the behavioural characteristics of its product and the quality and/or performance requirements of its customers. In particular, material converters, that is those businesses that convert a material into a food contact article, will need to take account of the legal requirements that apply to each of the components of the article. This could include, for example, different plastic layers (possibly including recycled material), adhesives, coatings, colorants, inks, functional barriers and possibly non-plastic layers This will ensure the product is fit for the intended purpose and that any restrictions or conditions for the product's use within the legislative requirements are established and explained. The business will have to provide information on the performance of the whole product in relation to the requirements laid down in EU law to ensure the operating margins are understood by the customer in case it affects the customers operation.

16. An important consideration is whether or not so-called 'dual use' additives have been used in the material. That is to say a substance used for its technical effect in the material which is also an authorised food additive. The end user who puts food into the article will have to take account of the presence of the additive in case it migrates to the extent that too much of the additive could be present in the final food. Businesses will want to ensure adequate protection of their proprietary information and may establish procedures with their customers for the exchange of information deemed confidential and commercially sensitive. Measures to ensure the preservation of confidentiality may include confidentiality agreements and exchange of information only between named parties within the businesses. Businesses importing goods from non-EU companies must be particularly careful to ensure that their suppliers are aware of the EU standards with which goods must comply and should have defined procedures in place to ensure this.

17. From this it is clear that each business in the production chain, with the exception of the manufacturers of the starting substances for materials,

should have these controls in place and documented. This applies to the producers of the materials used for food contact, to those who convert the materials to products and those who combine these products with other goods, importers and so on through to the seller of the product to the fillers and the retailers.

GOOD MANUFACTURING PRACTICE (GMP)

18. Regulation (EC) No. 2023/2006, from 1 August 2008, requires that businesses establish and document good practices and procedures. The Regulation elaborates the general requirement from the 2004 Regulation in relation to GMP. In so doing it lays down the rules for the groups of materials and articles intended to come into contact with food that are listed in the annexes and combinations of those materials and articles or recycled materials and articles. The regulation applies to all sectors and to all stages of manufacture, processing and distribution of food contact materials and articles, but not the production of the starting substances used in the manufacture of food contact materials and articles. The detail of the Regulation defines GMP as those aspects of quality assurance that ensure that materials and articles are consistently produced and controlled to ensure compliance with the rules applicable to them and with the quality standards appropriate to their intended use. It ties this definition securely into the general requirement, of Article 3, of the 2004 Regulation. It also defines what it means by the terms:

(a) '*good manufacturing practice* (GMP)'. These are those aspects of quality assurance that ensure that materials and articles are consistently produced and controlled to ensure they comply with the law and with the quality standards appropriate to their intended use that does not endanger human health or cause unacceptable changes in the composition of the food or a deterioration in its sensory characteristics;

(b) '*quality assurance system'*. This is the total sum of the organised and documented arrangements made to ensure that materials and articles are of the quality required to comply with the law and the quality standards necessary for their intended use;

(c) '*quality control system.'* This means the systematic application of the quality assurance system to ensure that starting materials, intermediate and

finished materials and articles comply with the specification determined in the quality assurance system.

19. In elaborating the first two of these terms, the GMP Regulation requires that business operators document their systems and apply them proportionately to the size of the business to avoid excessive burden on the business. The documented system put in place in the business has to be made available to the Authorities for inspection on demand. Annex 1 provides an outline of some common issues to take account of in developing the use and documentation of good manufacturing practices.

DECLARATIONS OF COMPLIANCE

20. The European Regulation requires that specific measures for particular materials and articles provide for them to be accompanied by a written declaration attesting their compliance with the rules that apply to them. This compliance has to be documented and made available to the authorities on demand. The rules on regenerated cellulose film, ceramics and food contact plastics already contain more detailed provisions concerning compliance declarations.

21. Generally, declarations accompanying food contact materials and articles and provided to the business customer should contain information about:

i. who manufactured or imported the materials or articles or the substances intended for their manufacture;
ii. what they are;
iii. when the declaration was made;
iv. confirmation that the materials or articles meet relevant requirements laid down in Regulation (EC) No 1935/2004 and in any specific measures;
v. information about the compliance of substances used that are subject to any restrictions and/or specifications that will allow the downstream businesses ensure compliance with those restrictions;
vi. information about the compliance of substances subject to a restriction in food, about the level of their specific migration and, where appropriate, purity criteria to enable the user of these materials or articles to comply with the law;
vii. specifications on the use of the material or article, such as:
    - type or types of food with which it is intended to be put in contact;

- time and temperature of treatment and storage in contact with the food;
- ratio of food contact surface area to volume used to establish the compliance of the material or article;

viii. confirmation that the material or article complies with any rules on functional barriers when one is incorporated into the material or article.

Best Practice

The written declaration must make it easy to identify the materials, articles or substances it relates to. It has to be renewed whenever a change in production or materials supply affects changes in the behaviour of the product, migration of substances from it or when new scientific data are available. A senior member of the business providing the declaration should be designated the person responsible for the declaration, its documentation and its provenance.

22. Two generic formats for written declarations are provided at Annex 2 that may inform businesses own document design for such a declaration. These formats deal with the minimum requirements of the legislation.

ISSUES FOR COMPLIANCE DECLARATIONS

23. *Language:* The declaration of compliance and its supporting documentation shall be written in a language understood by the business to which it is provided and the enforcement authority that requires to see it.

Best Practice

Knowledge of suppliers and customers: It is common business good practice to know enough of the requirements of your customers to be able to supply their demands. This knowledge of the customer's requirements should be sufficient to enable the supplier to determine the suitability of the product for the customer's needs in relation to its technical and performance specification.

Product Analysis: There are two general points:

- Sampling for analysis should be done at critical points in the manufacturing process. These are likely to be points in the process at which critical action takes place, possibly in terms of a

temperature or time-critical event or some other event whose success is critical to the finished product;
- Sample analysis should follow a standardised method for which the laboratory has accreditation.

24. Model *calculations:* Modelling to enable migration from food contact plastics to be calculated must follow recognized methods.

25. Retailers of 'own brand' goods are regarded as producers of food and should have the same documentation as 'branded' food producers and processors. Similarly, retailers who import pre-packed food or food contact materials directly should have the same documentation as the mainstream importers of such goods.

26. Some business sectors argue that it is not always possible to provide a comprehensive compliance declaration to all customers. They argue that this is because, in some cases, the detailed use to which the customer might put the material or article cannot be ascertained at their point in the production chain. In such cases, it is argued, the compliance of the material is delegated to the purchaser. In the legislation on food contact plastics Directive 2007/19/EC inserted a new Article 9 into Directive 2002/72/EC that is explicit in requiring that, at the marketing stages other than the retail stage, plastic materials and articles as well as the substances intended for their manufacture, shall be accompanied by a written declaration in accordance with Article 16 of Regulation (EC) No 1935/2004. No exception from this requirement is provided for.

27. However, in providing a declaration in accordance with this requirement, the business supplying the material or article will make it clear what the necessary conditions of use will apply. This may restrict the temperatures to which the article or material may be exposed, or, for example, the types of foodstuff with which it has been tested. Under these circumstances it becomes the responsibility of the purchasing business to test the product under its conditions of use should it depart from those laid down in the compliance declaration provided by the supplier.

28. This has implications for enforcement officers. They need to be aware of the requirement as it exists in the Plastic Materials and Articles in Contact with

Food Regulations for food contact plastics in particular as they are enacted in the territories of the United Kingdom.

The Food Standards Agency,
Incident Prevention and Chemical Risk Management Unit,
The Food Contact Materials Team.
London.
January 2009

ANNEX 1: COMMON ISSUES TO TAKE INTO ACCOUNT IN DEVELOPING THE USE AND DOCUMENTATION OF GOOD MANUFACTURING PRACTICES

ACKNOWLEDGEMENT

This annex draws on the guide to good manufacturing practice prepared by the European Council of Paint, Printing Ink and Artists' Colours Industry (CEPE), it does so in conjunction with guides by other European and national representative associations. The Agency is happy to acknowledge the significant contribution their work has made to this more generalised guidance for all businesses to apply as appropriate and proportionately within their businesses.

Best Practice

In relation to the manufacture of food contact materials and articles, Good Manufacturing Practice (GMP) is a legal requirement. It applies to the procedures for their formulation, production and control. The elements of GMP described here will help to ensure that products comply with the law or other generally accepted requirements, are fit for the purpose intended and meet customers needs of the product.

Controls

Manuals

Detailed operational manuals cover orders receipt, formulation, manufacture and product delivery to agreed standards. Recording systems ensure that the correct action for each stage can be verified.

Production Instruction Documents

An instruction document (sometimes called a 'batch card') is issued for each batch of products manufactured. This details the materials, quantities and equipment to be used and highlights any process critical operations and any specific precautions to be followed. Each stage is recorded.

Product Test Specifications

Product test specifications should exist for each product. They list the tests which are required during and following manufacture to ensure the batch meets the required specification and is fit for intended use according to agreed tests. The specifications should contain the appropriate tolerances for each test.

Quality Review Procedure

In the event of non-compliance at any stage of the process or of a complaint, a procedure should exist to take preventative or corrective action to find the cause, rectify the problem, and if necessary make the appropriate improvement(s) to the manuals or other controls to prevent a repetition. A person should be appointed to accept responsibility for the rectification processes.

Personnel and Training

Commitment

The entire workforce, involving all levels of management should be committed to the objectives of GMP to make it work. The benefits to the business should be obvious.

Training

Training programmes and facilities should be established to ensure that all personnel are fully aware of their functions and responsibilities and are competent to carry them out.

Raw Material Controls

Objective

GMP requires complete co-operation with the suppliers of raw materials and knowledge of the needs of the customer. Raw materials should be carefully selected to ensure that the components of the food contact material or article comply with the requirements of appropriate EU or national legislation, are suitable for the necessary quality standard and are within agreed tolerances.

Suitability

Raw materials should be selected and used so that, when the product is correctly

used, it should not:

- endanger human health;

- cause a deterioration in the sensory nature of the foodstuff;

- bring about an unacceptable change in the composition or quality of the foodstuff.

Any industry-wide agreement or practice concerning substances, their purity or quality criteria that means they should not be used on safety grounds should be observed and noted.

Specifications

Each raw material should have a specification agreed between the supplier and the manufacturing customer. The specification should include physical and chemical properties, including purity criteria, to maintain agreed manufacturing quality and end use technical requirements.

Compliance

Raw materials should be tested in house or, alternatively, be supported by a declaration of compliance from the raw material supplier that relates to the agreed specification and any legal requirements. In some instances pre-delivery samples representing the batch may be submitted to the manufacturing customer for special tests prior to the delivery being accepted.

Identification and Traceability

A name, reference number and batch or delivery number should identify each raw material, so that it can be traced, if necessary. The traceability of raw materials is achieved throughout the production chain and in-house by the delivery and/or batch reference numbers. It is a legal requirement that traceability exists at least to the level of one stage back and one stage forward.

Storage and Use

Raw materials should be stored under conditions that prevent contamination or deterioration. Rejected materials should be clearly marked as such and kept apart from those to be used. Raw material stocks should be rotated and used on a first-in

first-out basis.

Material or Article Technical Requirements

The following parameters should be considered and any effect on the material understood when formulating food contact materials and articles:

- Type of material and/or component combinations;
- Type of foodstuffs being brought into contact;
- Type of processes and equipment involved;
- Package-forming and filling processes;
- End-user specifications;
- Compliance to health, safety and consumer protection regulations;
- Compliance with environmental policies manufacturing processes and end-use.

Food contact material products should be formulated in such a way as to:

- have the necessary resistance to physical and chemical stress,
- be suitable for the method of use/processing and for subsequent converting processes,
- have the substance combination to meet product resistance specifications such as ISO standards or other agreed end use specifications,
- ideally have no measurable transfer or migration of substances into the foodstuff when appropriately used, or migration only within limits in law.

Production

Objective

To convert raw materials into products specified to meet the customers' requirement.

Manufacturing Instruction Document

Manufacturing instructions should be issued and followed for each batch, giving details of the raw materials, the quantities and the equipment to be used. Critical parts of the process should be recorded and checked by the operator.

Manufacturing Formulation

Only raw materials that have passed the prescribed quality control procedures are

used in quantities and proportions necessary to ensure the quality of the product.

Equipment

The equipment used should be suitable to manufacture the products required and be maintained in good repair; clean and, where necessary, calibrated. Maintenance documentation should be established and monitored.

Quality Control

Objective

To carry out laboratory and manufacturing tests on manufactured food contact materials and articles to ensure they are supplied to the customer fit for end use, conforming to customer's specifications and the law relating to them.

Production Quality Control

Testing of product samples at selected stages of the process should be carried out in order to monitor the required quality standard. A procedure should be established for process operators to adjust the process or product within specified limits when necessary.

Testing

Products should be sample tested to ensure they meet established specifications at each critical stage. Test methods may be agreed with customers.

Test Equipment

All measuring equipment must be maintained and tested and/or calibrated where appropriate to a schedule to ensure that the test results are accurate.

Product Information

Identification

A descriptive title or a trade name, reference number and specific batch number, should identify each product.

Compliance

Each delivery of the product must be supported by a declaration of compliance, confirming that it meets the agreed specification, with direct reference to any restriction or criteria laid down in EU law.

Data Sheets and Documentation

Each product has supporting product data sheets detailing relevant chemical, physical and safety data, and suitable end uses and methods of application. Testing on the product during manufacture should be recorded and retained. Data on the legal compliance of the product should also be retained and updated whenever there has been change in production process, raw material or specification.

Packaging

Specification

Packaging for the product should be selected to protect it during shipment and storage and to ensure it conforms to the appropriate national, European and UN requirements for the nature of the product packed and the means of transport.

Cleanliness

New containers should be inspected for cleanliness. Returned containers should be inspected and cleaned, if necessary, to avoid any contamination with other products or foreign materials.

Accurate Filling

Filling controls must be accurate within legal measuring limits. All weighing equipment must be examined for accuracy, re-calibrated if necessary and frequently inspected.

Labelling

Each container should have the minimum following information on labels:

- identification of the producer
- reference number and description of product
- batch number

- net weight
- health, safety and transport information as required.

Storage

All products (including raw materials) should be stored in conditions that prevent, as far as possible, any deterioration of the material. Where appropriate a procedure exists to test stock that may have been held for some time to ensure it continues to conform to specification. Rejected stock should be clearly marked as such and isolated to avoid accidental use.

Delivery

All products should be delivered in clean and clearly labelled suitable containers.

ANNEX 2, PART A: A FORMAT FOR A DECLARATION OF COMPLIANCE BASED ON REGULATION (EC) NO.1935/2004 ARTICLE 3

Best Practice

Name of Manufacturer/Importer/Supplier				
Batch/Consignment Contents				
Date of Declaration				
Points of note (product usage, storage, handling etc.)				
Identification of food additives used in the material.	Name and CAS number:		Restriction in food:	
Declaration of compliance with Article 3 of Regulation (EC) No 1935/2004				
Substance and CAS Number	Detected Migration Level	Estimated Daily Intake (Evidence of calculations should be maintained in supporting documentation for further reference and examination)	**A**. Formally pronounced Acceptable Daily Intake or Tolerable Daily Intake ADI/TDI	Compliance/Non-compliance (add any conditional comments)
			B. Company's own calculated safe level of daily intake	
			A.	
			B.	

ANNEX 2, PART B: A FORMAT FOR A DECLARATION OF COMPLIANCE BASED ON A SPECIFIC MEASURE E.G. DIRECTIVE 2002/72/EC:

Best Practice

Manufacturer/Importer/Supplier		
Contents		
Date of Declaration		
Declaration of compliance with [Title of specific EU measure/National instrument]		
Information about the compliance of substances used that are subject to any restrictions and/or specifications.		
All substances - compliance with the overall migration limit [10 mg/dm2of the surface area of the material or article] [60 mg/kg foodstuff]		
Individual substances	Restrictions in law	Test results (or estimated level of migration from calculations – method(s) of calculation should be maintained in supporting documentation and retained for inspection by the Authorities)
1.		
Etc.		
Information about the compliance of substances subject to a purity criteria (where applicable)		
Substance	Restrictions in law	Established migration
1		
Etc.		

Information about the use of 'dual-use' additives in the material.		
Food additive	Restriction in food law.	Established migration
1.		
Etc.		

Specifications on the use of the material or article:

type or types of food with which it is intended to be put in contact;

time and temperature of treatment and storage while in contact with the food;

ratio of food contact surface area to volume used to establish the compliance of the material or article;

Other specifications:

Functional barrier (if part of the material or article) – declaration of compliance

Signed _____ Position _____-

Date _____

ANNEX 3 - REGULATORY TEXT RELEVANT TO LEGAL COMPLIANCE GUIDANCE

Issue	EC Reference	Extract	England Reference	Extract	Comment
Defining food contact materials and articles	Regulation (EC) No. 1935/2004 Article 1	*Article 1* **Purpose and subject matter** 1. The purpose of this Regulation is to ensure the effective functioning of the internal market in relation to the placing on the market in the Community of materials and articles intended to come into contact directly or indirectly with food, whilst providing the basis for securing a high level of protection of human health and the interests of consumers. 2. This Regulation shall apply to materials and articles, including active and intelligent food contact materials and articles, (hereinafter referred to as materials and articles) which in their finished state: (a) are intended to be brought into contact with food; or (b) are already in contact with food and were intended for that purpose; or (c) can reasonably be expected to be brought into contact with food or to transfer their constituents to food under normal or foreseeable	The Materials and Articles in Contact with Food (England) Regulations 2007.	PART 1 Preliminary **Interpretation** 2. (3) Expressions used in these Regulations and in Regulation 1935/2004 have the same meaning in these Regulations as in that Regulation	Section 2 and paragraph 3.2 of the Guide. In the 1987 regulations a Directive was transposed and terms used in that Directive were defined and used in the regulations. In the 2007 regulations a European regulation is given full effect by the England regulations and it is as a point of clarity that this reference appears.

Issue	EC Reference	Extract	England Reference	Extract	Comment
		conditions of use.			
Excluding particular materials and articles from the Regulation.	Regulation (EC) No. 1935/2004 Article 1	*Article 1* **Purpose and subject matter** 3. This Regulation shall not apply to: (a) materials and articles which are supplied as antiques; (b) covering or coating materials, such as the materials covering cheese rinds, prepared meat products or fruits, which form part of the food and may be consumed together with this food; (c) fixed public or private water supply equipment.	The Materials and Articles in Contact with Food (England) Regulations 2007.	Part 1 Preliminary ***Scope*** Regulation 3. The provisions of these Regulations do not apply to those materials and articles specified in sub-paragraphs (a), (b) and (c) of Article 1(3).	Section 2 and paragraph 3.2 of the Guide.
The general requirement.	Regulation (EC) No. 1935/2004 Article 3	*Article 3* **General requirements** 1. Materials and articles, including active and intelligent materials and articles, shall be manufactured in compliance with good manufacturing practice so that, under normal or foreseeable conditions of use, they do not transfer their constituents to food in quantities which could: (a) endanger human health; or (b) bring about an unacceptable change in the composition of the food; or (c) bring about a deterioration in the organoleptic characteristics thereof. 2. The labelling, advertising and presentation of a material or	The Materials and Articles in Contact with Food (England) Regulations 2007.	PART 2 General Requirements for Materials and Articles **Enforcement of Regulation 1935/2004** Regulation 1. Subject to the provisions of Article 27 (transitional arrangements), any person who contravenes any of the following provisions of Regulation 1935/2004 is guilty of an offence — Article 3 (general requirements);	Paragraph 3.3 and 4.3 and, for GMP, paragraphs 4.2

Issue	EC Reference	Extract	England Reference	Extract	Comment
		article shall not mislead the consumers.			
Business documentation: ***GMP***	Regulation 2023/2006 on GMP	*Article 4* **Conformity with good manufacturing practice** The business operator shall ensure that manufacturing operations are carried out in accordance with: (a) the general rules on GMP as provided for in Article 5, 6, and 7, (b) the detailed rules on GMP as set out in the Annex.	The Materials and Articles in Contact with Food (England) Regulations 2007.	PART 3 General Requirements for Materials and Articles **Enforcement of Regulation 2023/2006** Regulation 5 Any person who fails to comply with the requirements of Article 4 (conformity with good manufacturing practice) of Regulation 2023/2006 is guilty of an offence.	Paragraph 4.1 and 4.2.
Declarations of compliance	Regulation 1935/2004	*Article 16* Declaration of compliance 1. The specific measures referred to in Article 5 shall require that materials and articles covered by those measures be accompanied by a written declaration stating that they comply with the rules applicable	The Materials and Articles in Contact with Food (England) Regulations 2007	PART 4 General Requirements for Materials and Articles **Enforcement of Regulation 1935/2004** Regulation 2 Subject to the provisions of Article 27 (transitional arrangements), any person who contravenes any of the following provisions of Regulation 1935/2004 is guilty of an offence — (e) Article 16(1) (declaration of compliance);	Paragraphs 4.1 and 4.3. Additional requirements relating to declarations of compliance are given in the specific measures, namely **Directives: 2002/72/EC** on plastic materials and articles in contact with food; **2005/31/EC** amending Council Directive 84/500/EEC as regards a declaration of compliance and

Issue	EC Reference	Extract	England Reference	Extract	Comment
		to them. Appropriate documentation shall be available to demonstrate such compliance. That documentation shall be made available to the competent authorities on demand. 2. In the absence of specific measures, this Regulation shall not prevent Member States from retaining or adopting national provisions for declarations of compliance for materials and articles.			performance criteria of the analytical method for ceramic articles intended to come into contact with foodstuffs; and, **2007/42/EC** relating to materials and articles made of regenerated cellulose film intended to come into contact with foodstuffs. Directive 2002/72/EC is enacted in England by The Plastic Materials and Articles in Contact with Food (England) Regulations 2008, the other Directives are enacted in England by The Materials and Articles in Contact with Food (England) Regulations 2007.
Good manufacturing	Regulation 2023/2006 on	*Article 5* **Quality assurance system** 1. The business operator shall	The Materials and Articles in Contact	PART 5 General Requirements for Materials and	Section 5. Paragraphs 5.1 and 5.2

Issue	EC Reference	Extract	England Reference	Extract	Comment
Practice (detail)	GMP	establish, implement and ensure adherence to an effective and documented quality assurance system. That system shall: (a) take account of the adequacy of personnel, their knowledge and skills, and the organisation of the premises and equipment such as is necessary to ensure that finished materials and articles comply with the rules applicable to them; (b) be applied taking into account the size of the business run by the operator, so as not to be an excessive burden on the business. 2. Starting materials shall be selected and comply with pre-established specifications that shall ensure compliance of the material or article with the rules applicable to it. 3. The different operations shall be carried out in accordance with pre-established instructions and procedures. *Article 6* **Quality control system** 1. The business operator shall establish and maintain an effective quality control system. 2. The quality control system	with Food (England) Regulations 2007	Articles **Enforcement of Regulation 2023/2006** Regulation 5 Any person who fails to comply with the requirements of Article 4 (conformity with good manufacturing practice) of Regulation 2023/2006 is guilty of an offence.	Although the European regulation gives detailed provisions regarding GMP in Articles 5, 6 and 7, these all elaborate the basic provision established under Article 4. Our national regulations therefore need only refer to the need to comply with Article 4.

Issue	EC Reference	Extract	England Reference	Extract	Comment
		shall include monitoring of the implementation and achievement of GMP and identify measures to correct any failure to achieve GMP. Such corrective measures shall be implemented without delay and made available to the competent authorities for inspections. *Article 7* **Documentation** 1. The business operator shall establish and maintain appropriate documentation in paper or electronic format with respect to specifications, manufacturing formulae and processing which are relevant to compliance and safety of the finished material or article. 2. The business operator shall establish and maintain appropriate documentation in paper or electronic format with respect to records covering the various manufacturing operations performed which are relevant to compliance and safety of the finished material or article and with respect to the results of the quality control system. 3. The documentation shall be made available by the business operator to the competent authorities at their request.			

Issue	EC Reference	Extract	England Reference	Extract	Comment
Declarations of Compliance (detail)	Regulation 2023/2006 on GMP Detail is taken from Directive 2002/72/EC Annex	*Article 16 (as above)* **ANNEX VIa** **DECLARATION OF COMPLIANCE** The written declaration referred to in Article 9 shall contain the following information: (1) the identity and address of the business operator which manufactures or imports the plastic materials or articles or the substances intended for the manufacturing of those materials and articles; (2) the identity of the materials, the articles or the substances intended for the manufacturing of those materials and articles; (3) the date of the declaration; (4) confirmation that the plastic materials or articles meet relevant requirements laid down in this Directive and Regulation (EC) No 1935/2004;	The Materials and Articles in Contact with Food (England) Regulations 2007 The Plastic Materials and Articles in Contact with Food (England) Regulations 2008	PART 6 General Requirements for Materials and Articles (as above). **Labelling** **1.**—(1) At marketing stages other than the retail stage a person who places on the market any plastic material or article or any substance intended for the manufacture of a plastic material or article must ensure that the plastic material or article or substance is accompanied by a written declaration which — accords with Article 16(1) of Regulation (EC) No. 1935/2004; contains the information specified in Schedule 4.; and complies with paragraph (2). (2) A written declaration made under paragraph (1) must be revised when substantial changes in the production of a plastic material or article for which the declaration is issued bring about changes in the migration or when new scientific information is available.	Section 6 The generic requirement is in Regulation (EC) No. 1935/2004. However, the most developed expression of the generic requirement is given in the rules on food contact plastics, Directive 2002/72/EC as amended. It is these requirements that are used here as the basis for guidance and best practice.

Issue	EC Reference	Extract	England Reference	Extract	Comment
		(5) adequate information relative to the substances used for which restrictions and/or specifications are in place under this Directive to allow the downstream business operators to ensure compliance with those restrictions; (6) adequate information relative to the substances which are subject to a restriction in food, obtained by experimental data or theoretical calculation about the level of their specific migration and, where appropriate, purity criteria in accordance with Directives 95/31/EC, 95/45/EC and 96/77/EC to enable the user of these materials or articles to comply with the relevant Community provisions or, in their absence, with national provisions applicable to food; (7) specifications on the use of the material or article, such as: (i) type or types of food with which it is intended to be put in contact; (ii) time and temperature of treatment and storage in contact with the food; (iii) ratio of food contact surface area to volume used to			

Issue	EC Reference	Extract	England Reference	Extract	Comment
		establish the compliance of the material or article; (8) when a plastic functional barrier is used in a plastic multi-layer material or article, the confirmation that the material or article complies with the requirements of Article 7a(2), (3) and 4 of this Directive. The written declaration shall permit an easy identification of the materials, articles or substances for which it is issued and shall be renewed when substantial changes in the production bring about changes in the migration or when new scientific data are available.			
Language issues	Directive 2002/72/EC, as amended by Directive 2007/19/EC	**ANNEX VIa** **DECLARATION OF COMPLIANCE** The written declaration shall permit an easy identification of the materials, articles or substances for which it is issued and shall be renewed when substantial changes in the production bring about changes in the migration or when new scientific data are available.	The Plastic Materials and Articles in Contact with Food (England) Regulations 2008	SCHEDULE 1 Information to be contained in a declaration of compliance	Paragraph 7.1 Schedule 4 brings into effect the main specific provisions of Annex Via of the Directive, but there is no specific reference to language. However, under the due diligence provisions in the legislation the business buying-in the material or article must ensure that it understands any

Issue	EC Reference	Extract	England Reference	Extract	Comment
					declaration provided to it so that it is able to meet it's responsibilities to its downstream customers. It should therefore be a matter of contractual obligation that the declarations it receives are in a language it understands, can us and show to an enforcement officer to establish the compliance of its products.
Mathematical modelling of migration.	Directive 2002/72/EC, as amended by Directive 2007/19/EC	**ANNEX VIa** **DECLARATION OF COMPLIANCE** 6) adequate information relative to the substances which are subject to a restriction in food, obtained by experimental data or theoretical calculation about the level of their specific migration and, where appropriate, purity criteria in accordance with Directives 95/31/EC, 95/45/EC and 96/77/EC to enable the user of these materials or articles to comply with the relevant Community provisions or, in their absence, with national provisions applicable to food;	The Plastic Materials and Articles in Contact with Food (England) Regulations 2008	SCHEDULE 2 **Information to be contained in a declaration of compliance** 6 Adequate information relating to the substances which are subject to a restriction in food, obtained by experimental data or theoretical calculation about the level of their specific migration and, where appropriate, purity criteria in accordance with the purity Directives to enable the user of the materials or articles to comply with the relevant Community provisions or, in their absence, with national provisions applicable to food.	Paragraph 7.4 The Directive, and reflected in the regulations, deals with using calculations to establish migration in the context of the compliance declaration. However, as with the issue of language, the business would be failing in its due diligence behaviour if it did not use a recognised, validated method of calculation to establish substance

Issue	EC Reference	Extract	England Reference	Extract	Comment
					migration levels by theoretical means.

Circulation List

Name	Company
Mr Alan Turner OBE	
Julia Scott	
Mr Paul Anthony Taylor	
Nigel Barnwell	
Joy Hardinge OBE	AJH Consulting
Mr A J Newbould	AJN Solutions
Dr P Donnelly	APD Scientific Limited
Mr Alex Martin	AMDEA
Anton Davis	Alba Plastics
	Association of Consumer Research
	Association of Port Health Authorities
Mrs R McBrown	Avent Limited
Nicola Smith	Bird and Bird
Dr Steve Owen	Boots PDQ Centre
Mr A J Newbould	British Coatings Federation
	British Disposable Products Association
Allen Johnson	British Hardware and Housewares Manufacturers Association Ltd
Dr Mercia Gick	British Plastics Federation
Sarah Plant	British Plastics Federation
Sally Barber	British Retail Consortium
Lucy Pearson	British Soft Drinks Association
Peter Vincent	BPIF
Mr Roger Hamby	CATRA
Alex Cole	Cadbury Schweppes
John Hammond	Campden & Chorleywood Food Research Association
Mr N Byrd	Campden & Chorleywood Food Research Association
Mr Keith Warren	Catering Equipment Suppliers Association
Dr S Parry	Centre for Analytical Research in the Environment
Dr Joanne Lloyd	Chemical Industries Association
Ms K Goodburn	Chilled Food Association
Victoria Sayer	Colormatrix Europe
Andrew Barnetson	Confederation of Paper Industries
Richard Whittaker	Crown Corporate Technologies
Mr J Begg	Dairy Industry Federation
Mr Brian McMullen	Danapak Flexibles Limited
Catherine Trueman	Department for the Environment, Food and Rural Affairs
Steve Ringer	Department for Business, Enterprise and Regulatory Reform
Mr John Askew	Dexter Packaging Products
Liz Fleming	Eclipse Scientific Group
	Enterprise Directorate
	Federation of Small Businesses
Ann Davison	FOODAWARE

Mr Richard Ratcliffe	Food Additives and Ingredients Association
Andrew Curtis	Food And Drink Federation
Dr Stephen Fellows	Food Policy Update
	Friends of the Earth
Ian Blakemore	Halton Borough Council
Mr R Colwell	H J Heinz
Mr Julian Stocker	H J Heinz
David Eaves	ICI Paints
Mr J Plaistowe	ICI Packaging Coatings Limited
	Industry Council for Packaging and the Environment
Mr Richard Armstrong	Innovia Films
Mr Jeff Graham	JEFPAC Limited
Mr Darren Prosser	Kenwood Limited
Mr John Webb-Jenkins	Kirkstone Plastics Limited
Dr Derek Craston	Laboratory of the Government Chemist
Dr John Francis	Laboratory of the Government Chemist
Mr Les Bailey	LACORS
Jon Averns	London Port Health Authority
Mr Christopher Sherlock	Lovell White Durrant
Peter Wight	Marks & Spencer Plc
Mr D A Smith	Metal Packaging Manufacturers Association
Mr A Woods	Metal Packaging Manufacturers Association
Sue Dibb	National Consumer Council
Mrs A Townshend	National Consumers' Federation
Katsuji Shibata	Nippon Gohsei
	Office of Fair Trading
Mr Roger Parry	Packaging and Films Association
Mr David Tyson	Packaging and Films Association
Robert Broughton	Packaging and Films Association
Martin Unwin	Packaging and Films Association
David Creek	Pillsbury Europe
Martin Addicott	Pulse Speciality Products
Mr I Cooper	PIRA International
Michael Burcher	Plastics Europe
Mr J Sidwell	RAPRA Technology Limited
Mr Roy Dixon	RDA Packaging Consultants
Mr Trefor Owen	Rexam Plastic Packaging
Ms L Creighton	SafePharm Laboratories Limited
John Figgins	Sainsburys Supermarkets Limited
Mr Stan Webb	Sinclair International Limited
Mrs L Freeman	Society of Chemical Industry
Matt Taylor	Spikomat Limited
	Sustain
Mr John Swift	SCA Packaging
Ms Lynda Hamilton	Technical Indexes
Iain Ferguson	The Co-operative Retail Group (CWS) Ltd
Mr Ken Hardman	The Industrial Packaging Association
Mr Pete Watts	Toxicology Advice & Consulting Limited

Mr N Cull	Trading Standards Institute
Mr Barry Pamplin	United Biscuits (UK) Limited
Kay Flett	UNIVAR Limited
Mr D Finnegan	Weetabix Limited
Ms A Bristow	WHICH
Mr Ronald Pierre-Davis	Wilsanco Plastics Limited